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From: HarborComments <HarborComments@epa.gov>
Sent: Monday, July 25, 2016 8:48 PM
To: PortlandHarbor
Subject: FW: Clean Up Portland Harbor
Attachments: 345289054495726144.pdf

From: (b) (6)
Sent: Monday, July 25, 2016 1:51 PM
To: HarborComments <HarborComments@epa.gov>
Subject: Re: Clean Up Portland Harbor

Clean Up Portland Harbor

Letter

Dr. Ms. McCarthy, The proposed cleanup of the Portland Harbor is a big win for industry and a bad deal for the public. EPA's cleanup proposal tackles just 8% of a site area that is 100% toxic. A more aggressive plan is needed to prevent even more harm to human health and the environment. On behalf of all people who rely on the river for food, recreation, employment and culture, I urge the EPA to implement a plan that: Moves quickly and sustainably reduces contaminants causing harm to Willamette and Columbia River resources. Includes ongoing monitoring and cleanup upriver and downriver from the site. Contributes to healthy fish that are safe to eat for all people. Holds polluters accountable for creating a safer Portland Harbor. These elements get us closer to the plan our communities deserve. And I deserve a clean, safe Portland Harbor. *Submitted during the comment period between June 9, 2016 to August 8, 2016 regarding the EPA's Portland Harbor Feasibility Study and Proposed Plan.

First Name

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Last Name

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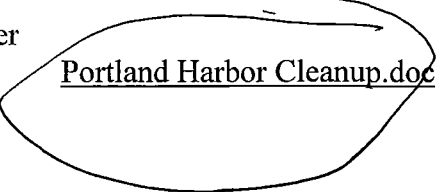
Message (500 Character Limit)

Draft plan leaves too much acreage contaminated. Monitored Natural Recovery inadequate. Cleanup plan must result in

removal of fish consumption advisory in 10-20 years. See my attached letter for more detail.

Upload your own letter
(.pdf, .doc or .docx, 1
MB limit)

Portland Harbor Cleanup.doc



July 25, 2016

EPA Administrator Gina McCarthy
Dear Ms. McCarthy,

I write to submit comments on the EPA's draft Portland Harbor Superfund Cleanup Plan. After much thought about the matter and in the wake of a boat tour of the most polluted sites in Portland Harbor, I offer the following points.

First, I think the plan relies too much on "monitored natural recovery." A wait-and-see approach has not been working since heyday of river contamination in the 20th century; and it won't work any more quickly now. Given the ongoing disturbance of sediments by ocean-going shipping, the contaminants continue to emerge into our river. This wait-and-see, do-nothing approach is inadequate and will make all of us liable to the spread of contaminants downstream, into the Columbia River, and thence into the Pacific Ocean. This must not happen. The problems with "monitored natural recovery" are thrown into high relief when we consider the issue of who would be doing the monitoring 100 or 200 or 300 years from now. The toxins will still be toxic; will there be any responsible party present to monitor the recovery and upgrade the practices as necessary in case "monitored natural recovery" proves ineffective? Better to clean it up now, while we have the capacity to do so, and be done with it so subsequent generations are not faced with challenges they may not be able to meet.

Second, the plan's provisions for limited dredging are inadequate. Far more acreage should be dredged and removed altogether from the river. Any option to create a toxic waste-disposal dump in the river or alongside of it should be dismissed. Toxic sediments must be dredged, removed from the river, and taken to an appropriately sited and constructed landfill where the toxic waste will be sequestered from propellers and safe from earthquakes for centuries to come.

Third, capping instead of dredging toxic sediments is an approach of questionable utility. Capping certain portions of contaminated river bed might work — if this area were not inevitably exposed to what promises to be one of the largest and most destructive earthquakes ever anticipated in North America, namely, the gigantic quake expected to result from slippage of tectonic plates in the Cascadia Subduction Zone. Any cleanup plan that fails to provide sustainable security from toxic waste contamination spreading in the aftermath of liquefaction of soil and sediments in and along the Willamette is clearly inadequate. Any provision for capping sediments in this draft plan should be significantly upgraded to account for the trauma expected from this major earthquake.

Fourth, and most critically, the final plan must result in the removal of the fish consumption advisory so that eating fish from the Lower Willamette is just as safe as eating fish from anywhere else in the Willamette. And this must happen within a 10-20 year time frame. The Willamette river belongs to the citizens of this city, this state, this nation — not to large business corporations. Citizens should be able to eat fish from this river safely — that is the birthright of all citizens and residents. So the final plan **MUST** result in the removal of the fish consumption advisory within ten to twenty years. If it does not, the plan will fail its most crucial test, which is whether the river can be restored to a life-giving presence for the land and its people instead of remaining a life-degrading poisonous process that threatens us all.

Finally, polluters must pay. Entities liable for the pollution must be held accountable; they must pay for a comprehensive cleanup that will restore the life-giving nature of the river, protect our citizens, and uphold the health of creatures in the entire watershed. I know that

municipal, regional, and state governments will be liable for a portion of the cleanup costs. As a citizen, I stand ready to pay my share through increased taxation. If I can afford to pay my share, how much more should huge business corporations, who have revenues of tens of millions or several billion dollars annually, be compelled to pay if they have proven liability for toxic pollution in the Willamette River? Polluters must pay; liable entities — private corporations and public governmental entities alike — must be held accountable to pay for a comprehensive cleanup of the Willamette River.

Sincerely,

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